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Attorney for Debtor,  
MARICELA ROJAS

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
MODESTO DIVISION**

In re: MARICELA ROJAS, ) Case No.: 11-91859  
 )  
 ) DCN – TOG-2  
 )  
Debtor. ) DATE: August 10, 2011  
 ) TIME: 10:00 am  
 ) DEPT: US Bankruptcy Court  
 ) 1200 I Street, Suite 4  
 ) Modesto, CA

**MOTION OF DEBTOR TO COMPEL ABANDONMENT  
OF BANK ACCOUNTS BY TRUSTEE**

Debtor hereby requests an order requiring the trustee to abandon the Wells Fargo Checking and Savings accounts of Ofelia Castaneda, mother of Debtor (Four Accounts) for the reasons set forth in the Declaration of Debtor. Filed concurrently herewith

Date: July 1, 2011 /s/ Thomas O Gillis  
THOMAS O. GILLIS, Attorney